

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

**GENERAL MOTORS CORP., et al**  
Debtors.

Case No.: 09-50026 -REG  
Jointly Administered

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**STATEMENT OF ATTORNEYS FOR CREDITORS PURSUANT TO RULE 2019**

Borges & Associates, LLC (“Borges”), makes its Statement of Attorneys for Creditors Pursuant to Rule 2019 (the “Statement”) in the above styled and numbered case, and respectfully states and shows as follows:

1. On June 1, 2009, the Debtors each commenced a case under Chapter 11 of the Bankruptcy Code and continue to operate their business and manage their properties as Debtors in Possession pursuant to 11 U.S.C. §§ 1107(a) and 1108. The cases are being jointly administered.

2. Borges is counsel for the following creditors and has filed a Notice of Appearance on behalf of each creditor to whom it is providing representation. These creditors are as follows:

3. Raycom Media, Inc. (“Raycom”) is a pre-petition creditor of Debtors with a principal place of business at 201 Monroe Street, Montgomery, Alabama. Various radio and television stations owned by Raycom provide advertising services to the Debtors. Raycom is the holder of one or more executory contracts with the Debtors, which the Debtors are assuming.

4. Ferguson Enterprises, Inc. (“Ferguson”) is a pre-petition creditor of Debtors with a place of business at 12500 Jefferson Avenue, Newport News, VA. Ferguson sells various

goods to the Debtors and continues to supply goods to the Debtors on a postpetition basis. Ferguson is the holder of one or more executory contracts with the Debtors, which the Debtors are assuming.

5. Borges has served as counsel for Raycom from time to time for several years in connection with various business matters. In connection with Raycom's representation in this bankruptcy proceeding, Borges bills Raycom as it customarily bills its other clients.

6. Borges has represented Ferguson in connection with bankruptcy proceedings for several years. Borges bills Trouw as it customarily bills its other clients.

7. Raycom and Ferguson are each aware of the multiple representation by Borges. Each of the creditors identified herein above hold claims against the Debtors. Nothing contained herein is intended to waive or limit any rights and/or remedies of either of the above creditors which they may assert against Debtors under any applicable law, and the above creditors hereby reserve their ability to assert any and all such rights to which they may be entitled.

Dated: July 7, 2009

BORGES & ASSOCIATES, LLC

By: s/ Wanda Borges  
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Counsel for:  
Raycom Media, Inc.  
Ferguson Enterprises, Inc.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 7, 2009 a true and correct copy of the foregoing STATEMENT PURSUANT TO RULE 2019 has been served via electronic mail to those identified on the CM/ECF system for this case and upon the following by first class mail.

General Motors Corporation  
30009 Van Dyke Avenue  
Warren, Michigan 48090-9025  
Attn: Warren Command Ctr, Mailcode 480206-114

Weil, Gotshal & Manges LLP  
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Harvey R. Miller, S. Karotkin, Joseph J. Smolinsky

U.S. Treasury  
1500 Pennsylvania Avenue NW Room 2312  
Washington, DC 20220  
Attn: Matthew Feldman, Esq.

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Attn: John J. Rapisardi, Esq.

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Vedder Price, P.C.  
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Attn: Michael J. Edelman Esq, Michael L. Schein, Esq.

Office of the U.S. Trustee  
33 Whitehall Street - 21<sup>st</sup> Floor  
New York, New York 10004  
Diana G. Adams, Esq.

s/      Wanda Borges  
WANDA BORGES